

**IN THE
COURT OF CRIMINAL APPEALS OF TEXAS**

HAROLD MICHAEL MOORE
Appellant,

§
§
§
§
§
§
§

FILED
COURT OF CRIMINAL APPEALS
2/2/2017
ABEL ACOSTA, CLERK

VS.

No. PD-1056-16

THE STATE OF TEXAS
Appellee.

**MOTION FOR EXTENSION OF TIME
TO FILE APPELLANT'S MERITS BRIEF**

TO THE HONORABLE JUDGES OF SAID COURT:

HAROLD MICHAEL MOORE, Appellant in the above-styled and numbered cause, by and through his attorney of record, WILLIAM R. BIGGS, hereby moves for an extension of time to file his brief. He would respectfully show the Court the following.

1. Current Deadline for filing Appellant's Brief: February 6, 2017
2. Length of Time Requested for the Extension: 7 days.
3. Number of Prior Extensions of Time: None.

5. Counsel needs additional time to review the record, research, and prepare the Appellant' Merits Brief. Counsel has been pressed on a number of other state and federal criminal matters currently pending in Tarrant County, the United States District Court for the Northern District of Texas, Fort Worth Division, the United States Court of Appeals for the Fifth Circuit, the U.S. Supreme Court, and this Court. Among other things, Counsel has had to research, draft and prepare briefs in the following other matters during the current briefing period:

U.S. Supreme Court	Cathey, Shawn 16-7545	Petition for Certiorari, filed 1/9/17
Fifth Circuit	Hall, Damon 16-11418	Initial Brief, filed 1/22/17
Texas Court of Criminal Appeals	Gilbert, Chelsea PD-1451-16 PD-1450-16	Petition for Discretionary Review, filed 1/23/17

Finally, Counsel also manages a large number cases pending in trial courts in Tarrant County, TX and the United States District Court for the Northern District of Texas which have required his attention during the period. Among other things, he has specifically had to research and draft the following written submission during the briefing period:

<i>United States v. Meza</i> , 4:14-CR-265-Y	Response to Presentence Report Addendum, filed Jan. 1/31/17
--	--

Counsel is also currently in the process of preparing the following written submission:

<i>United States v. Meza</i> , 4:14-CR-265-Y	Motion for Downward Variance, to be filed 2/3-26/17.
--	---

5. The State does not oppose the motion.
6. Appellant is incarcerated.

WHEREFORE, PREMISES CONSIDERED, Appellant prays that this Court will extend the time within which to file Appellant's Merits Brief by 7 days, until Monday, February 13, 2017.

Respectfully submitted,

/s/ William R. Biggs

William R. Biggs
WILLIAM R. BIGGS, PLLC
115 W. 2nd St., Suite 202
Fort Worth, TX 76102
817.332.3822 (t)
817.332.2763 (f)
wbiggs@williambiggsllaw.com
TX Bar No. 24052832

CERTIFICATE OF CONFERENCE

On February 1, 2017, I, WILLIAM R. BIGGS, or my agent, hereby certify that I conferred with the Tarrant County District Attorney's Office regarding the foregoing motion and the State is UNOPPOSED to the motion.

/s/ William R. Biggs

WILLIAM R. BIGGS

CERTIFICATE OF SERVICE

I hereby certify that on February 2, 2017, I will file a copy of the foregoing electronically. Mr. Landon Wade will receive electronic notice of this filing at coaappellatealerts@tarrantcounty.com. A copy of this motion also will be sent via USPS mail to Mr. Landon Wade, Tarrant County District Attorney's Office, 401 W. Belknap, 4th Floor, Fort Worth TX 76196. Finally, a copy of this motion will be sent to Harold Moore, TDCJ# 02028926, Jester III Unit, 3 Jester Road, Richmond, Texas 77406.

/s/ William R. Biggs

WILLIAM R. BIGGS